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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
PROFESSIONAL OFFSHORE		
OPPORTUNITY FUND, LTD., a company	:	11-cv-04321-LAK
registered under the laws of the British Virgin		
Islands,	:	
	:	
Plaintiff,	:	
	:	<b>NOTICE OF MOTION</b>
-against-	:	
	:	
HUIFENG BIO-PHARMACEUTICAL	:	
TECHNOLOGY, INC., a Nevada corporation,	:	
	:	
Defendant.	:	
	:	
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**PLEASE TAKE NOTICE THAT,** upon the accompanying memorandum of law, the Declaration of Andrew T. Solomon, the Declaration of Howard Berger, the Rule 56.1 Statement of Material Facts, and all prior pleadings and proceedings had herein, plaintiff Professional Offshore Opportunities Fund, Ltd. will move this Court, Hon. Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for entry of an order granting plaintiff summary judgment against defendant Huifeng Bio-Pharmaceutical Technology, Inc. pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's direction at the preliminary conference held on October 7, 2011, any answering papers in response to this motion are due to be filed on or before November 29, 2011, and any reply papers are due to be filed on or before December 5, 2011.

Dated: New York, New York  
November 2, 2011

SULLIVAN & WORCESTER LLP

By: /s/\_\_\_\_\_

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